

# **Exhibit I**

## Natalie Huh

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**From:** Jason Williams  
**Sent:** Friday, July 8, 2022 12:44 PM  
**To:** Bryce T. Barcelo; Proxense; Proxense-SG  
**Cc:** QE-Samsung-Proxense; Lear Jiang  
**Subject:** RE: Proxense v. Samsung | Invalidity Contentions  
**Attachments:** Exhibit 905-Y Ludtke.pdf; Exhibit 905-Z Okereke.pdf; Exhibit 989-L (Pocket Vault) Amended.pdf; Exhibit 989-X Johnson.pdf; Exhibit 989-Y Ludtke.pdf; Exhibit 989-Z Okereke.pdf; Exhibit 730-L (Pocket Vault) - Amended.pdf; Exhibit 730-X (Johnson).pdf; Exhibit 730-Y Ludtke.pdf; Exhibit 730-Z Okereke.pdf; Exhibit 905-L (Pocket Vault) Amended.pdf; Exhibit 905-X Johnson.pdf

Bryce,

Samsung's supplementation of its invalidity contentions is based on the Court's claim construction order in conjunction with documents received from third parties regarding Pocket Vault, which were previously produced to Proxense. Our request to supplement is also based on Samsung's recent EPRs. Although we are in the process of supplementing our response to Proxense's interrogatory regarding invalidity contentions, for full transparency, we are attaching Samsung's Supplemental Final Invalidity Contentions to this email.

Further, Proxense will not be prejudiced by this supplement. Indeed, much of the third party discovery was previously produced, this supplement is prior to next month's fact discovery deadline, and in any event is well before Proxense's rebuttal invalidity reports that are due in September. Proxense will also have a chance to depose Samsung's expert regarding the art contained in these supplements, and many of the charts simply add evidence to previously disclosed claim charts. This Court has routinely granted motions to amend in similar circumstances. *See e.g., TurboChef Techs., Inc. v. Garland Com. Indus., LLC*, No. 07-cv-1330-F, 2010 WL 11618339, at \*2-3 (W.D. Tex. June 24, 2010) (finding good cause to amend final invalidity contentions after service of expert reports in light of new prior art discovered).

Please confirm that Proxense does not oppose Samsung's supplemental contentions no later than COB Tuesday, July 12, 2022. To the extent that Proxense opposes, please confirm that you are available to meet and confer on Wednesday at 11 AM ET.

Thanks.

Jason C. Williams | Quinn Emanuel Urquhart & Sullivan, LLP | 212.849.7401

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**From:** Bryce T. Barcelo <BBarcelo@susmangodfrey.com>  
**Sent:** Wednesday, July 6, 2022 12:36 PM  
**To:** Jason Williams <jasonwilliams@quinnemanuel.com>; Proxense <proxense@hechtpartners.com>; Proxense-SG <sg-proxense@hechtpartners.com>  
**Cc:** QE-Samsung-Proxense <qe-samsung-proxense@quinnemanuel.com>; Lear Jiang <LJiang@susmangodfrey.com>  
**Subject:** Re: Proxense v. Samsung | Invalidity Contentions

[EXTERNAL EMAIL from [bbarcelo@susmangodfrey.com](mailto:bbarcelo@susmangodfrey.com)]

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Counsel,

Please let us know the specific basis, including the document(s) produced by Proxense, which Samsung intends to rely upon to supplement its invalidity contentions. As well, let us know if Samsung intends to change any part of its

previously asserted invalidity theories and, if so, which invalidity theories Samsung is making changes to. We are available to meet and confer next week to discuss, if necessary.

Sincerely,

**Bryce Barcelo | IP Counsel | Susman Godfrey LLP**  
1000 Louisiana St. | Ste. 5100 | Houston, TX 77002  
(713) 653-7871 (office) | (713) 398-4159 (cell)

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**From:** Jason Williams <[jasonwilliams@quinnemanuel.com](mailto:jasonwilliams@quinnemanuel.com)>  
**Date:** Thursday, June 30, 2022 at 8:32 PM  
**To:** Proxense <[proxense@hechtpartners.com](mailto:proxense@hechtpartners.com)>, Proxense-SG <[sg-proxense@hechtpartners.com](mailto:sg-proxense@hechtpartners.com)>  
**Cc:** QE-Samsung-Proxense <[qe-samsung-proxense@quinnemanuel.com](mailto:qe-samsung-proxense@quinnemanuel.com)>  
**Subject:** Proxense v. Samsung | Invalidity Contentions

**EXTERNAL Email**

Counsel,

Based on information recently obtained during discovery, Samsung intends to supplement its invalidity contentions. Please let us know Proxense's position. We are available to discuss during a meet and confer early next week.

Thanks,  
Jason

**Jason Williams**  
*Associate*  
**Quinn Emanuel Urquhart & Sullivan, LLP**

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